

MEMO ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DEVI NAMPIAPARAMPIL,
Plaintiff,
-against-

THE NEW YORK CITY CAMPAIGN
AMY LOPREST, DAVID DUHALDE,
FREDERICK SCHAFFER, BETHAN
SOLLARS, JACLYN WILLIAMS & T
Defendants

February 12, 2025


Dear Judge Ramos,

**MOTION
FOR RECUSAL/**

**MOTION
TO STAY**

City is directed to respond by Wednesday, February 19, 2025. The Court will discuss the motions at the upcoming conference being held on Thursday, February 20, 2025 at 11:30 AM in Courtroom 619 at the Thurgood Marshall United States Courthouse.

It is SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: 2/13/2025
New York, New York

Pursuant to 28 U.S.C. § 455(a) and (b)(1), I the Plaintiff, Devi Nampiaparampil, respectfully move for the recusal of Judge Edgardo Ramos due to a pattern of procedural irregularities, bias, and favoritism toward the Defendants, which has severely prejudiced my ability to litigate my claims fairly. Most importantly, this pattern of conduct has violated my right to Freedom of Assembly with other similarly-situated individuals as we strive to consolidate our claims before the Judicial Panel on Multidistrict Litigation (JPML). I further request a stay of all proceedings pending resolution of this motion to prevent improper dismissal of this case before another judge can review the record fairly.

I. LEGAL STANDARD FOR RECUSAL

Under 28 U.S.C. § 455(a), a judge must recuse himself “in any proceeding in which his impartiality might reasonably be questioned.” Under § 455(b)(1), a judge must recuse himself where he “has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding.” Courts recognize that even the appearance of bias can be grounds for recusal.

II. PATTERN OF PROCEDURAL IRREGULARITIES AND BIAS